

AB:MAA

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

----- X

UNITED STATES OF AMERICA

- against -

MICHAEL McMANUS,

Defendant.

----- X

EASTERN DISTRICT OF NEW YORK, SS:

Thomas Jack, being duly sworn, deposes and states that he is a Deputy United States Marshal with the United States Marshals Service, duly appointed according to law and acting as such.

On or about March 8, 2021, within the Eastern District of New York and elsewhere, the defendant MICHAEL McMANUS, having been convicted of an offense, did knowingly and intentionally escape from the custody of the Attorney General or his authorized representative.

(Title 18, United States Code, Section 751(a))

TO BE FILED UNDER SEAL

**COMPLAINT AND AFFIDAVIT
IN SUPPORT OF APPLICATION
FOR ARREST WARRANT**

(18 U.S.C. § 751(a))

Case No. 21-MJ-322

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about September 11, 2012, defendant MICHAEL McMANUS pleaded guilty in the Southern District of New York to four counts of bank robbery by force or violence, in violation of 18 U.S.C. § 2113(a). See Minute Entry, United States v. Michael McManus, No. 12-CR-356 (JMF) (S.D.N.Y. Sept. 11, 2012). McMANUS was sentenced to 120 months' imprisonment to be followed by three years of supervised release pursuant to a judgment entered on April 4, 2013. See Judgment, United States v. Michael McManus, No. 12-CR-356 (JMF), ECF No. 31 (S.D.N.Y. Apr. 4, 2013).

2. On or about December 10, 2020, McMANUS was transferred from U.S. Penitentiary Coleman II to Brooklyn House, a residential reentry center (commonly known as a halfway house) in Brooklyn, New York, where he was not scheduled to be released until June 11, 2021.

3. According to records from Brooklyn House, on or about March 8, 2021, McMANUS was granted permission to leave Brooklyn House on an approved job search itinerary pass and to return by 2:00 p.m. that day.

4. On or about March 8, 2021, Brooklyn House staff became aware that McMANUS failed to make a contact call upon arriving at the authorized destination, failed to answer calls to his cellular telephone from Brooklyn House staff, and subsequently failed

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

to return to Brooklyn House as required. McMANUS was placed on escape status on March 8, 2021.

5. On or about March 11, 2021, McMANUS called his therapist, with whom he was scheduled to meet that afternoon. McMANUS advised that he had left Brooklyn House and did not plan to return.

6. As of the date of the filing of this Complaint, McMANUS has not returned to Brooklyn House.

7. It is respectfully requested that this Court issue an order sealing, until further order of the Court, all papers submitted in support of this application, including the application and arrest warrant, as disclosure would give the defendant an opportunity to change patterns of behavior and flee from or evade prosecution, and therefore would have a significant and negative impact on the continuing investigation and may severely jeopardize its effectiveness.

WHEREFORE, your deponent respectfully requests that a warrant issue for the arrest of the defendant MICHAEL McMANUS so that he may be dealt with according to law.



Thomas Jack
Deputy United States Marshal
United States Marshals Service

Sworn to before me by telephone this
15th day of March, 2021



HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK